

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BENEFICIAL INNOVATIONS, INC.,

Plaintiff,

vs.

ADVANCE PUBLICATIONS, INC., a New York corporation; ALM MEDIA PROPERTIES, LLC, a Delaware limited liability company; AMAZON.COM, INC., a Delaware corporation; AMERICAN MEDIA, INC., a Delaware corporation; AUTOTRADER.COM, INC, a Delaware corporation; DELL INC., a Delaware corporation; DEMAND MEDIA, INC., a Delaware corporation; EXPEDIA, INC., a Delaware corporation; RODALE INC., a Pennsylvania corporation; SCRIPPS NETWORKS, LLC, a Delaware corporation; VIACOM INC., a Delaware corporation; VILLAGE VOICE MEDIA HOLDINGS, LLC, a Delaware corporation;

Defendants.

CASE NO. 2:11-CV-229-MHS-CMC

Jury Trial Demanded

JOINT CLAIM CONSTRUCTION CHART

Pursuant to P.R. 4-5(d) Plaintiff Beneficial Innovations, Inc. and Defendants Advance Publications, Inc., ALM Media Properties, LLC, Amazon.com, Inc., American Media, Inc., Autotrader.com, Inc., Demand Media, Inc., Expedia, Inc., Scripps Networks, LLC, Viacom, Inc., and Village Voice Media Holdings, LLC (collectively referred to as “Defendants”) hereby file these Joint Claim Construction Charts. The Joint Claim Construction Charts, attached hereto as Exhibit A1 (U.S. Patent No. 7,496,943) and Exhibit A2 (U.S. Patent No. 6,712,702), list the

complete language of the disputed claims with the disputed terms in bold type and include separate columns containing Plaintiff's and Defendants' proposed constructions along with a blank column for the Court's construction.

Dated: January 7, 2013

Respectfully submitted,

By: /s/ David E. Rosen

S. Calvin Capshaw State Bar No. 03783900
Elizabeth L. DeRieux State Bar No. 05770585
Capshaw DeRieux, LLP
114 E. Commerce Ave.
Gladewater, Texas 75647
Telephone: (903) 236-9800
Facsimile: (903) 236-8787
Email: ccapshaw@capshawlaw.com
Email: ederieux@capshawlaw.com

Of Counsel:

David E. Rosen
CA State Bar No. 155385
Murphy Rosen Meylan & Davitt LLP
100 Wilshire Boulevard, Suite 1300
Santa Monica, CA 90401
Telephone: 310-899-3300
Facsimile: 310-399-7201

Gregory S. Dovel
CA State Bar No. 135387
Julien Adams
CA State Bar No. 156135
Dovel & Luner, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, CA 90401

**ATTORNEYS FOR PLAINTIFF,
BENEFICIAL INNOVATIONS, INC.**

Dated: January 7, 2013

Respectfully submitted,

By: /s/ Christopher C. Miller

Christopher C. Miller Texas Bar No. 24013163
Mary-Olga Lovett Texas Bar No. 00789289
1000 Louisiana Street, Suite 1800
Houston, Texas 77002
Telephone: (713) 374-3500
Telecopier: (713) 374-3505

Nicholas A. Brown
Joseph R. Wetzel
Greenberg Traurig LLP
4 Embarcadero Center, Suite 3000
San Francisco, CA 94111-5983
Telephone: (415) 655-1300
Facsimile: (415) 707-2010

**ATTORNEYS FOR DEFENDANT
DEMAND MEDIA, INC.**

Dated: January 7, 2013

Respectfully submitted,

By: /s/ Stuart M. Rosenberg
Stuart M. Rosenberg (*Admitted Pro hac vice*)
Y. Ernest Hsin (*Admitted Pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1881 Page Mill Road
Palo Alto, CA 94304-1211
Telephone: 650.849.5300

Jennifer H. Doan
Texas Bar No. 08809050
J. Scott Andrews
Texas Bar No. 24064823
6500 Summerhill Road, Suite 100
Texarkana, TX 75503
Telephone: 903.255.1002
Fax: 903.255.0800

Wayne Barsky (*Admitted Pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
2029 Century Park East
Los Angeles, CA 90067-3026
Telephone: 310.552.8500
Fax: 310.551.8741

**ATTORNEYS FOR DEFENDANT
AMAZON.COM, INC., EXPEDIA, INC.,
SCRIPPS, INC., and VIACOM, INC.**

Dated: January 7, 2013

Respectfully submitted,
By: /s/ Samuel Franklin Baxter
Samuel Franklin Baxter, Esq.
McKool Smith
104 East Houston Street, Suite 300
Marshall, TX 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

Steven Lieberman
Brian Rosenbloom
Rothwell, Figg, Ernst & Manbeck
1425 K Street, NW, Suite 800

Washington, DC 20005
Telephone: (202) 783-6040
Facsimile: (202) 783-6031

**ATTORNEYS FOR DEFENDANT
ADVANCE PUBLICATIONS, INC., ALM
MEDIA PROPERTIES, INC.,
AUTOTRADER.COM, INC., and AMERICAN
MEDIA, INC.**

Dated: January 7, 2013

Respectfully submitted,
By: Mark C. Nelson
Mark C. Nelson
Texas Bar No. 00794361
Steven M. Geiszler
Texas Bar No. 24032227
2000 McKinney Avenue, Suite 1900
Dallas, Texas 75201-1858
Telephone: (214) 259-0900
Facsimile: (214) 259-0910

**ATTORNEYS FOR DEFENDANT
VILLAGE VOICE MEDIA HOLDINGS, LLC.**

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 7th day of January, 2013. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ David E. Rosen

David E. Rosen